

### **REMARKS/ARGUMENTS**

The office action of June 14, 2005 has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 1-8 and 11-14 and 16-32 remain in this application. Claims 9 and 10 were previously canceled and claim 15 has been canceled without prejudice or disclaimer.

Claims 1-2, 5-6, 11-12 and 27-28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Matthews et al., "Complete Reference FrontPage 2000," Public Release 1999 by Osborn/McGraw-Hill, CA ("Matthews") in view of U.S. patent no. 6,101,509 to Hanson et al. ("Hanson") and claims 3-4, 13-26 and 29-32 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Matthews in view of Hanson and further in view of U.S. patent publication no. 2002/0004813A1 to Agrawal et al. ("Agrawal"). Applicants respectfully traverse these rejections.

#### **Claims 1, 2, 5, 6, 11, 12, 27, and 28**

In the prior response, applicants argued that Hanson does not teach or suggest how the appropriate locations for inserting HTML tags are determined in the tab-based editors referenced by Hanson at col. 2, line 5. As such, Hanson lacks a teaching or suggestion of the claim 1 feature of detecting object tag elements within the selected portion; inserting immediately prior to each object tag element within the selected portion a second editing tag corresponding to the desired editing function and inserting the second editing tag at the end of the selected portion; and inserting immediately after each object tag element within the selected portion the first editing tag, wherein the first and second editing tags are distinguishable from the object tag elements. The action refutes applicants' position going into a prolonged discussion of object oriented editing. While applicants agree that Hanson describes an object oriented system, importantly, the action has failed to identify a specific teaching in Hanson or Matthews of the claim 1 features of detecting object tag elements within the selected portion; inserting immediately prior to each object tag element within the selected portion a second editing tag corresponding to the desired editing function and inserting the second editing tag at the end of the selected portion; and inserting immediately after each object tag element within the selected portion the first editing tag, wherein the first and second editing tags are distinguishable from the object tag elements. It

would appear that the action may be asserting that in an objected oriented editing system, these features of claim 1 are somehow inherent. To establish inherency however, it must be shown that these features must result and not that they possibly could result. Clearly, the action has failed to make such a showing. Indeed, the tags that would have been inserted by the applied combination would have been more than likely conventional HTML tags, which would not have needed to invoke the particular sequence of steps claimed. Referring to the illustrative example of the claim 1 invention depicted in figure 3a-c, figure 3b shows the tagged result when the selected portion of the Web-based document in figure 3a is “with charity for all; with firmness in the right, as God gives us to see the right” and the desired editing function to be performed is italicizing.

For at least this reason, the combination of Matthews and Hanson, even if proper, does not result in the claim 1 invention. For substantially the same reasons, independent claim 7, which calls for an object tag detecting module and an insertion module, is patentably distinct from Matthews and Hanson.

Claims 2, 5, 6, 11, 12, 27 and 28, which depend from claim 1 or claim 7, are allowable over the applied art for the same reasons as their ultimate base claim, and further in view of the additional advantageous features recited therein. For example, claim 5 (see also claim 11, which is similar) recites that when an object tag element closing a first function is found within the selected portion of the Web-based document without a corresponding object tag element opening the first function, the method includes inserting a third editing tag closing the first function immediately prior to the first editing tag immediately before the selected portion; and inserting a fourth editing tag opening the first function immediately after the first editing tag immediately before the selected portion. The combination of Matthews and Hanson is wholly devoid of any teaching or suggestion as to such a scenario. Moreover, such a scenario is not inherent for similar reasons as described with respect to claims 1 and 7.

Matthews and Hanson also fail to contemplate or render inherent the features of claims 6 and 12. For example, claim 12 recites that when an object tag element opening a first function is found within the selected portion of the Web-based document without a corresponding object tag element closing the first function, the insertion module inserts an editing tag opening the first function immediately after the editing tag immediately after the selected portion, and inserts an

editing tag closing the first function immediately before each object tag element within the selected portion after the object tag element opening the first function and inserts an editing tag reopening the first function immediately after each object tag element within the selected portion after the object tag element opening the first function.

**Claims 3-4, 13, 14, 16-26 and 29-32**

***1) Claims 3, 4 and 29-32***

The action rejects claims 3-4, 13-26 and 29-32 over the combination of Matthews, Hanson and Agrawal. Claims 3, 4 and 29-32, ultimately depend from one of claims 1 and 7. Agrawal does not remedy the defects of Matthews and Hanson as discussed with respect to claim 1. For at least these reasons, the combination of Matthews, Hanson and Agrawal, even if proper, does not result in the inventions of claims 3, 4, and 29-32.

As set forth in the prior response, applicants continue to submit that even assuming, but not admitting, that the combination of Matthews and Hanson discloses all the elements of claim 4, but for the steps of 1) detecting that the portion of the Web-based document where the first and second editing tags were located prior to the step of saving has been moved to a new location within the Web-based document; and 2) inserting the first and second editing tags at the new location within the Web-based document in the same relative position within the portion of the Web-based document where the first and second editing tags were inserted prior to being saved, Agrawal fails to remedy these defects. In refuting this position, the action notes that Matthews discloses absolute positioning. Absolute positioning as disclosed at page 412 in Matthews however is not relevant; “[a]bsolute positioning means that the object is located at a specific set of pixel coordinates independent of the screen resolution and therefore will not change even though the layout of text and other relative objects have changed with a different [sic] resolution.” Detecting that the portion of the Web-based document (WBD) has been moved to a new location within the WBD is wholly unrelated to detecting and maintaining a specific set of pixel coordinates on the display. Instead claim 1 involves detecting that *the portion* of the WBD with the editing tags has been moved to a new location within the WBD prior to the editing tags being saved and inserting the editing tags in *the same position in the portion* of the WBD, where they were inserted prior to being saved. The action has failed to show at least the steps of

detecting and inserting in claim 4. As such, the combination of Matthews, Hanson and Agrawal, even if proper, does not result in the claim 4 invention.

Also, claims 31 and 32 are similarly distinguishable from the applied combination for the same reasons as claim 4, and further in view of the additional advantageous features recited therein.

For example, claim 32 along with claim 30, which depends from claim 30, recites that the portion of the Web-based document including the editing tags includes contextual data, the contextual data aiding in identifying where editing tags were inserted prior to being saved. Notably, the contextual data aids in identifying where the editing tags were inserted prior to being saved. In Agrawal the valid cached blocks are retrieved and the remaining blocks of the page not stored in cache are dynamically generated and then this information is sent over a network to be reassembled. There is no suggestion with the combination of the applied art that contextual data would have identified where editing tags were inserted prior to being saved. For this additional reason, claims 30 and 32 are patentably distinct from the applied art.

## **2) *Claims 13, 14 and 16-26***

The action continues to reject claim 13 stating that the claim “incorporate substantially similar subject matter as cited in dependent claim 1 and 3” and is similarly rejected. As set forth in their last response, Applicants respectfully disagree with the characterization that claim 13 is similar to claim 3.

In any event, claim 13 has been amended to incorporate the features of now canceled dependent claim 15. As such, claim 13 recites that the editing tags each have a custom attribute to distinguish from the embedded tags. In one illustrative, non-limiting, implementation, the editing tags have a custom attribute that allows them to be identified as edits to the Web-based document such that redlined versions of the Web-based document can be generated. For example, the editing tags along with the custom attribute may include HTML tags such as bold, while the embedded tags may include an HTML tags such as bold; the custom attribute associated with the editing tags allows for differentiating between the editing and embedded tags. Matthews, Hanson or Agrawal alone or in combination neither teach nor suggest editing tags

each having a custom attribute to distinguish from the embedded tags as recited in amended claim 13. For at least this reason, claim 13 is considered patentable.

Claims 14-26, which ultimately depend from claim 13, are patentably distinct from the cited art for the same reasons as amended claim 13, and further in view of the features recited therein.

For example, claim 16 calls for storing the editing tags and context portions of the Web-based document associated with the editing tags; and reinserting the editing tags into the Web-based document based on the context portions. As similarly discussed to some extent with respect to claim 4, none of the references discloses reinserting the editing tags into the Web-based document *based on the context portions*. In addition, the applied art does not teach that the context portions of the Web-based documents include portions of the Web-based document immediately prior to and after where the editing tags were inserted into the Web-based document as recited in claim 17.

Nowhere does the applied art teach or suggest storing the editing tags and context portions of the Web-based document associated with the editing tags in a file including *data identifying a view* as recited in claims 18 and 20, and also the claim 20 steps of receiving a user selection identifying a file including data identifying a view; and redefining the editing tags to include the view prior to the step of reinserting the editing tags. Indeed, none of Matthews, Hanson or Agrawal alone or in combination suggests a view.

Moreover, the applied art is wholly devoid of a teaching or suggestion that reinserting includes *searching the Web-based document for the context portions* and *inserting the editing tags within corresponding context portions* of the Web-based document as recited in claim 21 or that the context portions of the Web-based document have changed location prior to the step of reinserting as called for in claim 22.

Claim 23 further calls for the context portions including n words before and after each editing tag. To show this feature, the action at page 7 refers to heading tags. The relevance of heading tags to the claim 23 feature is unclear. In one illustrative implementation of the claim 23 invention, the number “n” of words is chosen to aid in restoring in-line edits.

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Furthermore, the applied art lacks a teaching or suggestion of the step of scanning the selected portion of the Web-based document for previously added edit tags, wherein if the previously added edit tag corresponds to the desired editing operation then inserting a group editing tag next to the previously added edit tag as recited in claim 24 and the steps of assigning the editing tags a first custom order attribute; repeating the steps of scanning and inserting for a second set of editing tags; and assigning the second set of editing tags a second custom order attribute higher than the first custom order attribute as recited in claim 25.

### CONCLUSION

It is believed that no fee is required for this submission. If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted,

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